

STUART I. BLOCK (STATE BAR NO. 160688)
 sblock@coxcastle.com
 PERRY S. HUGHES (STATE BAR NO. 167784)
 phughes@coxcastle.com
 COX, CASTLE & NICHOLSON LLP
 555 California Street, 10th Floor
 San Francisco, CA 94104-1513
 Telephone: (415) 392-4200, Facsimile: (415) 392-4250

Attorneys for Plaintiff
 UNIVERSAL PARAGON CORPORATION and
 SUNQUEST PROPERTIES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNIVERSAL PARAGON CORPORATION, a
 Delaware corporation; and SUNQUEST
 PROPERTIES, INC., a California corporation,

Plaintiffs,

vs.

INGERSOLL-RAND COMPANY LIMITED, a
 Bermuda corporation; INGERSOLL-RAND
 CORPORATION, a New Jersey corporation;
 SCHLAGE LOCK COMPANY, a California
 corporation; and TOUCH-PLATE
 INTERNATIONAL, INC., a California
 corporation,

Defendants.

AND RELATED COUNTERCLAIM

Case No. CV-05-3100 TEH

**STIPULATION TO CONTINUE CASE
 MANAGEMENT CONFERENCE;
~~[PROPOSED]~~ ORDER**

Date: June 14, 2010
 Time: 1:30 P.M.

Proposed Date: September 13, 2010
 Time: 1:30 P.M.

The parties, Plaintiffs Universal Paragon Corporation and Sunquest Properties, Inc.
 (collectively "Plaintiffs") and Third Party Defendant Union Pacific Railroad Company, ("Union
 Pacific"), hereby stipulate, subject to the Court's approval as provided below, to a continuance of the
 Case Management Conference scheduled for June 14, 2010, so that they can continue in good faith to
 pursue settlement discussions. On May 13, 2010, the parties had a full day of mediation before the
 Honorable William L Bettinelli (Ret.). Though the parties were unable to reach a settlement, through

Judge Bettinelli they were able to share their respective positions on the facts and law relevant to Plaintiffs' claims. The parties agreed that a further exchange of information was needed to continue with settlement discussions. Plaintiffs are in the process of preparing a brief to Union Pacific to expand on positions expressed during the mediation. Both parties feel that an additional ninety (90) day continuance of the Case Management Conference would be beneficial to allow the parties to continue their settlement discussions. Accordingly, the Parties stipulate to, and request that the Court, continue the Case Management Conference to September 13, 2010, at 1:30 p.m., or such other date and time thereafter that is convenient to the Court so that they can continue to work towards a potential settlement.

Respectfully submitted,

DATED: June 9, 2010

COX, CASTLE & NICHOLSON LLP

By: /s/ Perry S. Hughes

Perry S. Hughes, Attorney for
Plaintiffs UNIVERSAL PARAGON CORP. and
SUNQUEST PROPERTIES, INC.

DATED: June 9, 2010

BARG COFFIN LEWIS & TRAPP LLP

By: /s/ John F. Barg

John F. Barg, Attorney for Counter-Defendant
Union Pacific Railroad Company

IT IS ORDERED that the Case Management Conference scheduled on June 14, 2010, is hereby continued to September 20, 2010 at 1:30 pm. **No further CMC continuances shall be granted.**

Dated: June 10, 2010

Honorable Thelton E. Henderson
United States District Judge

